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Department of Energy

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DEC 13 1994

94-DOE-12394

Mr. Martin Hestmark
U. S. Environmental Protection Agency, Region VIII
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Mr. Joe Schieffelin
Hazardous Waste Facilities Unit Leader
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Gentlemen:

Due to the number of comments on the Operable Unit 1 (881 Hillside; OU 1) Draft Corrective Measures Study/Feasibility Study (CMS/FS), it took some time for us to prepare responses to your comments. The preliminary draft of our responses to your comments was prepared for most (16 of 21 Colorado Department of Health and Environment (CDPHE) comments; and 5 of 9 Environmental Protection Agency comments) of the "general" comments on the CMS/FS. Our preliminary responses were telefaxed to your staff on December 6, 1994, in order to facilitate discussion, and hopefully, resolution at the staff level in the meeting of December 8, 1994.

At this meeting, however, your staff wanted to pursue other comments. In the spirit of cooperation, we did so but were only able to resolve 4 comments. We would like to summarize our understanding as to how these four comments were resolved.

The following are issues that were discussed in the meeting with the outcome presented:

- Remedial Action Objectives (CDPHE specific comment no. 46). Remedial Action Objective 2 is modified to read: "Prevent migration of contaminants from subsurface soils to groundwater that would result in groundwater contamination in excess of groundwater Applicable or Relevant and Appropriate Requirements for OU1 contaminants."

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- CDPHE general comment 2. role of the State and RCRA Corrective Action in Remedy Selection. We agreed to further discuss examples in subsequent meetings, assuming that our milestone extension requests are granted. We agreed to discuss the no action and the excavation alternative, at a minimum. Furthermore, we agreed to clarify the text and tables to note CERCLA/RCRA integration, so that the RCRA "checklist" could be performed by the State. We agreed to bring example text to the next meeting.
- CDPHE general comment 4. Information Necessary to Support a Corrective Action Decision. We agreed to expand the discussion to explain the leap from the Individual Hazardous Substance Sites to the groundwater "source area" so that the State could perform their "checklist".
- CDPHE general comment 3. the Department of Energy inappropriate proposal for a Corrective Action Management Unit (CAMU). We will reconsider our CAMU proposal, based upon the discussion that CAMU designation may not be necessary.

Because of the number of comments (over 100 general and specific comments), it should be clear that the consultative process to resolve comments will take time. We wish to pursue the consultative process, but you must grant sufficient time. As stated in the meeting, we are prepared to meet the December 22, 1994 milestone, but would rather have sufficient time to follow through with the consultative process. We would appreciate a prompt response to our December 6, 1994 (94-DOE-12381) request for extension so that we can plan accordingly, preferably by December 16, 1994.

If you have any questions, please contact Scott Grace at 966-7199.

Sincerely,



Steven W. Slaten
IAG Project Coordinator
Environmental Restoration

cc:

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Administrative Record